

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION**

**THE STATE OF TENNESSEE; THE
STATE OF ALABAMA; THE STATE OF
ALASKA; THE STATE OF ARIZONA;
THE STATE OF ARKANSAS; THE
STATE OF GEORGIA; THE STATE OF
IDAHO; THE STATE OF INDIANA;
THE STATE OF KANSAS; THE
COMMONWEALTH OF KENTUCKY;
THE STATE OF LOUISIANA; THE
STATE OF MISSISSIPPI; THE STATE
OF MISSOURI; THE STATE OF
MONTANA; THE STATE OF
NEBRASKA; THE STATE OF OHIO;
THE STATE OF OKLAHOMA; THE
STATE OF SOUTH CAROLINA; THE
STATE OF SOUTH DAKOTA; THE
STATE OF WEST VIRGINIA,**

Plaintiffs,

—and—

**ASSOCIATION OF CHRISTIAN
SCHOOLS INTERNATIONAL; A.S., a
minor, by Brandi Scarborough, her mother;
C.F., a minor, by Sara Ford, her mother;
A.F., a minor, by Sara Ford, her mother,**

Intervenor-Plaintiffs,

v.

**UNITED STATES DEPARTMENT OF
EDUCATION; MIGUEL CARDONA, in
his official capacity as Secretary of
Education; EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION;
CHARLOTTE A. BURROWS, in her
official capacity as Chair of the Equal
Employment Opportunity Commission;**

Case No. 3:21-CV-00308-CEA-DCP

**INTERVENOR-PLAINTIFFS'
MOTION TO JOIN
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

UNITED STATES DEPARTMENT OF JUSTICE; MERRICK B. GARLAND, in his official capacity as Attorney General of the United States; **KRISTEN CLARKE**, in her official capacity as Assistant Attorney General for Civil Rights at the United States Department of Justice,

Defendants.

Proposed Intervenor-Plaintiffs the Association of Christian Schools International, A.S., C.F., and A.F. (collectively, Intervenor-Plaintiffs), move pursuant to Federal Rules of Civil Procedure 10(c) and 65 to join in and adopt Plaintiffs' pending Motion for Preliminary Injunction (ECF No. 10) and the accompanying briefing (ECF No. 11). Although Intervenor-Plaintiffs' interests are unique from the Plaintiffs' (*see* Intervenor-Plaintiffs Proposed Verified Complaint and Intervenor-Plaintiffs' Memorandum in Support of Motion to Intervene, filed concurrently), they join and adopt Plaintiffs' motion to avoid disrupting the parties' agreed-to briefing schedule. However, Intervenor-Plaintiffs request time for oral argument at the November 3, 2021 hearing.

Respectfully submitted this 4th day of October, 2021.

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**Pro hac vice applications forthcoming*

Attorneys for Intervenor-Plaintiffs

Certificate of Service

I hereby certify that on the 4th day of October, 2021, I electronically filed the foregoing document with the Clerk of Court and that the foregoing document will be served via the CM/ECF system on all counsel of record.

s/ W. Andrew Fox

W. Andrew Fox

Attorney for Intervenor-Plaintiffs